

DATE FILED: 2/27/12

CIVIL ACTION NO. 1:11-cv-08450

NOW THEREFORE to resolve this dispute, it is hereby STIPULATED and AGREED by and between the parties through their respective counsel as follows:

1. Jefferson Han and Perceptive Pixel will produce or provide for inspection by March 1, 2012 any and all existing source code for the NYU demo reel and the 2006 TED Conference demonstration.

2. Jefferson Han and Perceptive Pixel will produce by March 1, 2012 any and all agreements between Jefferson Han and/or Perceptive Pixel and Apple and any and all emails relating to efforts by Apple to communicate with and/or recruit and/or hire Jefferson Han between January 1, 2005 and February 17, 2012; such production shall occur after a search of at least Jefferson Han's gmail account and all other email accounts that may have been used to communicate with Apple to the extent such accounts are currently under Mr. Han's control.

3. Jefferson Han will appear for a deposition upon oral examination prior to March 1, 2012 and in any event not later than March 15, 2012. If Mr. Han is unable to sit for a deposition prior to March 8, 2012, he will provide counsel for Motorola, HTC and Samsung with a declaration authenticating the source code and documents produced pursuant to the above-referenced subpoenas.

4. Motorola will agree to withdraw its motion to compel in exchange for Jefferson Han and Perceptive Pixel's agreement to this stipulation.

5. Motorola, HTC and Samsung agree that upon production of the documents identified in paragraphs 1 and 2 above, and upon satisfactory completion of Mr. Han's deposition and production of any material documents identified therein, Mr. Han's and Perceptive Pixel's obligations under all subpoenas issued by Motorola, HTC and Samsung will be complete. In the event that Motorola, HTC or Samsung contends that a document not encompassed in Paragraph 1 and 2 above, but identified at Mr. Han's deposition, is "material," Mr. Han and Perceptive Pixel retain all rights to dispute the assertion of "materiality."

6. This Court shall retain jurisdiction over this matter until such time as Jefferson Han and Perceptive Pixel have satisfactorily complied with all parts of this stipulation.

Respectfully submitted,



DATED: Feb. 17, 2012

By: _____
Brian Cannon

So ordered.

*Quinn Emanuel
Part I*

Feb. 27, 2012

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DATED: 2-17-12

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*Counsel for Jefferson Han and
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SO ORDERED:

U.S.D.J. 